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CORPORATE OFFICE

## Senate Bill 528

### Climate Solutions Now Act of 2022

#### Position: **Letter of Information**

#### Education, Health, and Environmental Affairs

February 15, 2022

The University of Maryland Medical System (UMMS) would like to provide information regarding SB528, the *Climate Solutions Now Act of 2022*. UMMS appreciates and supports the goals of this legislation to reduce greenhouse gas emissions. UMMS recognizes the risk that climate change poses to the communities we serve and as such, has established organizational sustainability goals and is in the process of finalizing a corporate Sustainability Declaration which includes carbon reduction.

UMMS owns and operates many buildings throughout the State that would be subject to the emission requirements established in this bill. UMMS constructs new buildings to LEED (Leadership in Energy and Environmental Design) Silver or higher standards as LEED certified buildings improve efficiency, lower carbon emissions and create healthier places for people. However, under the legislation, even buildings that are already high performing, like the LEED Gold Shock Trauma Center, would be expected to achieve an additional 20% and later 40% emissions reductions as the bill is currently written.

The Centers for Medicare & Medicaid Services (CMS) conditions of participation require health care organizations to provide an alternate source of power, should normal power not be available, for a minimum of 96 continuous hours.

Interconnected buildings pose another challenge. As an example, the grid does not independently support the newly constructed Shock Trauma building on the UMMC campus; instead, it is supported by a loop that interconnects the other buildings on campus. This design type offers redundancy, reliability and optimizes energy efficiency. If all new buildings on the UMMC campus were required to be all-electric, the loop is eliminated and would sacrifice redundancy, reduce reliability and increase construction costs.

It is also unclear that utility providers, would be able to provide the level of service and redundancy that UMMS requires through 100% electrification.

As stated above, UMMS appreciates and supports the State's efforts to reduce greenhouse gas emissions as a method for fighting climate change. However, due to the complexity of our buildings and regulatory factors at play, more time is needed for health care institutions and

institutions with large scale interconnected systems to work with the State to develop standards that meet all the needs.

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